

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA,)
)
 v.) CRIMINAL NO. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

**SEALED MOTION TO SEAL MOTIONS IN LIMINE, REPLIES TO
OPPOSITIONS, AND STATUS REPORT**

Defendant moves that the Court grant him leave to file the instant Motion and the following attached Motions:

1. *Motion In Limine to Exclude Evidence of Uncharged Crimes, Wrongs, and Other Acts;*
2. *Motion for Leave to Reply To Government's Opposition To Motion To Limit Testimony Of Government Terrorism Experts;*
3. *Reply to the Government's Opposition to Motion to Limit Testimony of Government Terrorism Experts;*
4. *Reply to the Government's Opposition to Defendant's Motion to Exclude Opinion Testimony Concerning Polymer, Tapes, and Fiber Matching; and*
5. *Defendant's Status Report and Notice of Guilt Phase Evidentiary Issues.*

The motions *in limine* and replies discuss and quote from non-public evidentiary disclosures and the Court has previously ordered litigation regarding *in limine* issues

sealed. Similarly, the Status Report and Notice of Guilt Phase Evidentiary Issues contains discussion of sensitive, non-public information.

Respectfully submitted,
DZHOKHAR TSARNAEV

By his attorneys



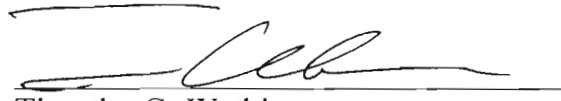
David I. Bruck, Esq. (SC Bar # 967)
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 460-8188
BRUCKD@WLU.EDU

Judy Clarke, Esq. (CA Bar # 76071)
CLARKE & RICE, APC
1010 Second Avenue, Suite 1800
San Diego, CA 92101
(619) 308-8484
JUDYCLARKE@JCSRLAW.NET

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM_FICK@FD.ORG

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that copies of this document filed under seal have been served on Assistant U.S. Attorneys William Weinreb, Alope Chakravarty, Nadine Pellegrini and Steven Mellin by email and will be served by hand delivery on January 9, 2015.


Timothy G. Watkins